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Mr. David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243

Re: Docket No. 97-00409: All Telephone Companies Tariff Filings

Regarding Reclassification of Pay Telephone Service.

UTSE Response to Agreed Discovery

Dear Mr. Waddell:

cc:

In accordance with the Pre-Hearing Officer's February 28, 2002 Order ("Order") and as set forth in United Telephone-Southeast, Inc.'s ("United"), March 1, 2002 letter, United hereby files its response to the agreed upon discovery request the parties' two experts agreed would totally fulfill all of the remaining discovery issues of the Tennessee Payphone Owners Association.

Please note that the information is proprietary and should be handled in accordance with the Protective Order entered in this case.

Sincerely,

James B. Wright

Parties of Record (with enclosure)

<u>CERTIFICATE OF SERVICE; DOCKET 97-00409</u> (Tariffs regarding Reclassification of Pay Telephone Service)

The undersigned hereby certifies that a copy of United's response to discovery was served upon the following parties of record by fax or by depositing a copy thereof in the U.S mail addressed as follows:

Henry Walker Boult, Cummings 414 Union Street, Suite 1600 Nashville, TN 37219

Consumer Advocate and
Protection Division
425 Fifth Avenue North, 2nd Fl.
Nashville, TN 37243

Guy M. Hicks BellSouth Telecommunications 333 Commerce St., Suite 2101 Nashville, TN 37201-3300

Jon E. Hastings Boult, Cummings, Conner & Berry 414 Union Street, Suite 1600 Nashville, TN 37219-1777 Ted G. Pappas Bass, Berry & Simms 2700 First American Center Nashville, TN 37238

Guilford R. Thornton, Jr. Esq. Stokes & Bartholomew 424 Church St, Suite 2800 Nashville, TN 37219-2386

James P. Lamoureux AT&T Communications 1200 Peachtree Street, Suite 8100 Atlanta, Georgia 30309

April 1, 2002

James B. Wright